I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates. The newspaper/broadcast

cross-ownership cap is a crucial element of our democratic media, and it should not be weakened.

To Whom it may concern:

My name is Jim Helenthal. I publish the Tri-State Shopper, based in Quincy, Illinois. Quincy is one of eight markets in the United States where a media company owns television, newspaper, and radio. I started the Tri-State Shopper in Quincy approximately one year ago. The new Shopper publication got off to a great start. Many retailers expressed the need for competition and were very happy to see us get started. The business community and shopping public has benefited. Since then, Quincy Newspapers Inc., "QNI", the media company which owns the local newspaper, television and radio stations, has not been so happy about the idea. Since I have started my small business, QNI has launched an angry campaign to put my small media company out of business. No expense has been spared to run my direct-mail weekly shopper publication out of town. The newspaper branch of the three-headed media company has tripled the distribution coverage as a way to eliminate the need for the Tr!

i-State Shopper, and, at the sam

e time prices have been cut to the bone to make it virtually impossible for our company to survive. For example, the newspaper increased delivery to nonsubscribers from 13,000 homes to over 40,000 homes at no additional cost to advertisers. The column inch rate remains at \$2.91, the same as it was for 13,000 distribution. Mail delivery was implemented. During the first month of our operation, the media combine distributed a disparaging letter to area retailers referring to my new shopper publication as a "rotten banana peel." Grocery store chains have been given up to 3 full page ads every week in the newspaper free of charge as a reward for not using my Shopper. Combination packages involving print, tv and radio, believed to be priced at or below cost, have been offered to Tri State Shopper advertisers -in exchange to have no use for my medium. These are only a few examples of the predatory behavior QNI is using to put me out of business. If these blatent exclusionar!

y practices continue, I can't se

e how we'll survive. There is no way in my mind to rationalize how the illegal maintenance of an out-of-control media monopoly is anywhere close to being in the best interest to a retail business community and consuming public.